BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 2000

Docket No. R2000-1

MOTION OF UNITED STATES POSTAL SERVICE FOR LATE ACCEPTANCE OF OBJECTION TO INTERROGATORY DBP/USPS-13 (March 16, 2000)

The United States Postal Service hereby moves for acceptance, three days late, of its response to interrogatory DBP/USPS-13, filed by David B. Popkin on March 10, 2000. This objection was delayed in order to check with other organizations about whether there are any reports that might be responsive to the interrogatory. Information was obtained today indicating that there are no responsive reports, and the objection therefore is able to provide that response to the interrogatory. The Postal Service objects nonetheless to protect itself in case Mr. Popkin expects a more thorough search for responsive reports.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

David H. Rubin

475 L'Enfant Plaza West, SW Washington, DC 20260-1137 (202) 268-2986; Fax -6187 March 16, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

David H. Rubin

475 L'Enfant Plaza West, SW Washington, DC 20260-1137 March 16, 2000